

1 Clayton P. Brust (Nevada Bar No. 5234)
2 Michaela G. Davies (Nevada Bar No. 15205)
3 ROBISON, SHARP, SULLIVAN & BRUST
4 71 Washington Street
5 Reno, Nevada 89503
6 Telephone: (775) 329-3151
7 Email: cbrust@rssblaw.com
8 mdavies@rssblaw.com

6 Eric Larson Zalud (Ohio Bar No. 0038959)
7 (*pro hac vice forthcoming*)
8 Laura E. Kogan (Ohio Bar No. 0087453)
9 (*pro hac vice forthcoming*)
10 BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP
11 200 Public Square, Suite 2300
12 Cleveland, Ohio 44114-2378
13 Telephone: (216) 363-4500
14 Facsimile: (216) 363-4588
15 Email: ezalud@beneschlaw.com
16 lkogan@beneschlaw.com

13 *Attorneys for Defendant DISH Network L.L.C.*

14 **IN THE UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 EULAINÉ WATKINS,

17 Plaintiff,

18 v.

19 NATIONAL CONSUMER TELECOM &
20 UTILITIES EXCHANGE, INC., *et al.*

21 Defendants
22

CASE NO. 2:22-cv-00718-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(First Request)

23 Pursuant to Local Rule IA 6-1 and 7-1, the parties, by and through their respective counsel,
24 stipulate and request that the Court extend the time period for Defendant DISH Network L.L.C.
25 (“Defendant”) to respond, by answer or otherwise, to Plaintiff’s Complaint.

26 Defendant has been investigating the allegations and claims set forth in the Complaint.
27 These investigations are currently ongoing. As a result, Defendant requests an enlargement of
28

time of fourteen days to prepare a responsive pleading to the Complaint, while Defendant's counsel continues to familiarize itself with the matter. Plaintiff does not object to the relief requested herein.

Accordingly, Defendant requests that, for good cause shown, the Court extend the May 31, 2022, deadline by fourteen days — until June 17, 2022 — in which to file an answer or other responsive pleading in this case. This request is made in good faith and not for the purpose of delay.

DATED: May 31, 2022

/s/ Gerardo Avalos

Michael Kind (Nevada Bar No. 13903)
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
Telephone: (702) 337-2322
Facsimile: (702) 329-5881
Email: mk@kindlaw.com

George Haines (Nevada Bar No. 9411)
Gerardo Avalos (Nevada Bar No. 15171)
FREEDOM LAW FIRM
8985 S. Easter Sierra Avenue, Suite 350
Las Vegas, Nevada 89123
Telephone: (702) 880-5554
Facsimile: (702) 385-5518
Email: ghaines@freedomlegalteam.com

Attorneys for Plaintiff Eulaine Watkins

DATED: May 31, 2022

/s/ Clayton P. Brust

Clayton P. Brust (Nevada Bar No. 5234)
Michaela G. Davies (Nevada Bar No. 15205)
ROBISON, SHARP, SULLIVAN & BRUST
71 Washington Street
Reno, Nevada 89503
Telephone: (775) 329-3151
Email: cbrust@rssblaw.com
mdavies@rssblaw.com

Eric Larson Zalud (*pro hac vice pending*)
Laura E. Kogan (*pro hac vice pending*)
BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP
200 Public Square, Suite 2300
Cleveland, Ohio 44114-2378
Telephone: (216) 363-4500
Facsimile: (216) 363-4588
Email: ezalud@beneschlaw.com
lkogan@beneschlaw.com

*Attorneys for Defendant DISH Network
L.L.C.*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: 6-1-2022

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused a true copy of the **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT** to be served on all parties to this action by:

_____ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

_____ personal delivery/hand delivery

 x emailing an attached Adobe Acrobat PDF version of the document to the email addresses below/facsimile (fax) and/or E-Filing pursuant to Section IV of the District of Nevada Electronic Filing Procedures

_____ Federal Express/UPS or other overnight delivery

_____ Messenger Service

Michael Kind, Esq.
KIND LAW
8860 S. Maryland Pkwy, Ste. 106
Las Vegas, NV 89123
mk@kindlaw.com

George Haines, Esq.
Gerardo Avalos, Esq.
FREEDOM LAW FIRM
8985 S. Eastern Ave., Ste. 350
Las Vegas, NV 89123
ghains@freedomlegalteam.com

Dated this 31st day of May, 2022.

/s/ Isabella Esguerra
Employee of Robison, Sharp, Sullivan & Brust